



*United States Attorney
Eastern District of New York*

AB:AL
F.#2009R01533

*271 Cadman Plaza East
Brooklyn, New York 11201*

June 8, 2010

BY EMAIL AND ECF

Kannan Sundaram, Esq.
Federal Defenders of New York, Inc.
1 Pierrepont Plaza, 16th floor
Brooklyn, New York 11201

Re: United States v. Dudely Ernest Jerrick
Criminal Docket No. 09-591 (JG)

Dear Mr. Sundaram:

The government provides this letter in anticipation of trial in the above-captioned case.

On April 12, 2010, the government informed you that its expert witness regarding the value of the cocaine that the defendant imported into the United States would be Special Agent Timothy Varian of the Department of Homeland Security, Immigration and Customs Enforcement ("ICE"). Because of scheduling conflicts, the government instead expects to call ICE Special Agent Tara A. Mulkearns as its expert regarding the value of that cocaine.

The government expects Special Agent Mulkearns to testify that the wholesale value of the seized cocaine was approximately \$165,000 and the street value of that cocaine was approximately \$385,000. The government further expects Special Agent Mulkearns to testify that the amount and purity of the cocaine seized in this case are consistent with distribution rather than personal use.

Special Agent Mulkearns holds a Bachelor's degree in International Studies from the University of South Florida. She has been a Special Agent with ICE for approximately seven years. She has participated in hundreds of criminal investigations involving the importation of cocaine into the United States. She has not previously testified in an expert capacity.

If you have any questions or further requests, please do not hesitate to contact me.

Very truly yours,

LORETTA E. LYNCH
United States Attorney
Eastern District of New York

By: /s/
Allon Lifshitz
Assistant U.S. Attorney
(718) 254-6164

cc: Clerk of Court (JG) (by ECF)